

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and
AT&T MOBILITY LLC,

Defendants.

Civil Action 6:12-cv-022

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS,

Defendants.

Civil Action 6:12-cv-122

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and
SPRINT SPECTRUM L.P.,

Defendants.

Civil Action 6:12-cv-123

ADAPTIX, INC.,

Plaintiff,

v.

T-MOBILE USA, INC.,

Defendant.

Civil Action 6:12-cv-369

ADAPTIX, INC.,

Plaintiff,

v.

AT&T MOBILITY LLC, ERICSSON INC.,
METROPCS COMMUNICATIONS, INC.,
and TELEFONAKTIEBOLAGET LM
ERICSSON,

Defendants.

Civil Action 6:13-cv-049

ADAPTIX, INC.,

Plaintiff,

v.

AT&T MOBILITY LLC, ERICSSON INC.,
METROPCS COMMUNICATIONS, INC.,
and TELEFONAKTIEBOLAGET LM
ERICSSON,

Defendants.

Civil Action 6:12-cv-050

**STIPULATION AND AGREED MOTION
TO MODIFY EXPERT DISCOVERY DEADLINES**

Plaintiff, Adaptix, Inc., and Defendants, Alcatel-Lucent USA, Inc., AT&T Mobility LLC, Cellco Partnership d/b/a Verizon Wireless, Sprint Spectrum L.P., Ericsson Inc., MetroPCS Communications, Inc., and Telefonaktiebolaget LM Ericsson (collectively, "the parties") hereby stipulate, subject to the approval of the Court, that:

1. The current deadlines for remaining expert discovery are as follows:

Pretrial Event	Deadline
Deadline to designate expert witnesses and reports on issues for which the party does not bear the burden of proof (¶ 5)	August 28, 2014
Expert discovery deadline	September 12, 2014

2. The parties have agreed to a limited modification of these deadlines to accommodate the schedules of the expert witnesses and counsel.

3. Modification of these dates will not affect any other scheduled dates.

4. The parties now file this stipulated request to modify those deadlines as follows:

Pretrial Event	Deadline
Deadline to designate expert witnesses and reports on issues for which the party does not bear the burden of proof (¶ 5)	September 3, 2014
Expert discovery deadline	September 17, 2014

Dated: August 8, 2014

By: /s/ Steven E. Lipman
 Paul J. Hayes (admitted *pro hac vice*)
phayes@hayesmessina.com
 Steven E. Lipman (admitted *pro hac vice*)
slipman@hayesmessina.com
 HAYES MESSINA GILMAN & HAYES LLC
 200 State Street, 6th Floor
 Boston, MA 02109

Respectfully submitted,

By: /s/ Stephen Swedlow
 Stephen Swedlow (*pro hac vice*)
 Thomas Cushing (*pro hac vice*)
 Brianne Straka (*pro hac vice*)
 Marc Kaplan (*pro hac vice*)
 Lauren Hillemann (*pro hac vice pending*)
 QUINN EMANUEL URQUHART &
 SULLIVAN LLP

Telephone: (617) 439-4200
Facsimile: (617) 443-1999

Craig Tadlock
Keith Smiley
TADLOCK LAW FIRM PLLC
2701 Dallas Parkway, Suite 360
Plano, TX 75093
Phone: (903) 730-6789

Attorneys for ADAPTIX, INC.

By: /s/ Geoffrey M. Godfrey
Mark D. Flanagan
Robert M. Galvin
Geoffrey M. Godfrey
WILMER CUTLER PICKERING
HALE AND DORR LLP
950 Page Mill Road
Palo Alto, CA 94304
Phone: (650) 858-6000
Fax: (650) 858-6100

Michael E. Jones
State Bar No. 10929400
Allen F. Gardner
State Bar No. 24043679
POTTER MINTON, P.C.
110 N. College, Suite 500
Tyler, Texas 75702
Tel: (903) 597-8311
Fax: (903) 593-0846
mikejones@potterminton.com
allengardner@potterminton.com

**Attorneys for CELLCO PARTNERSHIP
D/B/A VERIZON WIRELESS**

/s/ Douglas M. Kubehl
Douglas M. Kubehl
(Texas Bar No. 00796909)
doug.kubehl@bakerbotts.com
Jeffery S. Becker
(Texas Bar No. 24069354)
jeff.becker@bakerbotts.com
BAKER BOTTS L.L.P.

500 West Madison
Suite 2450
Chicago, Illinois 60661
Telephone: (312) 705-7400
Fax: (312) 705-7499
davenelson@quinnemanuel.com
stephenswedlow@quinnemanuel.com
thomascushing@quinnemanuel.com
briannestraka@quinnemanuel.com
marckaplan@quinnemanuel.com

Michael E. Jones
POTTER MINTON PC
110 North College, Suite 500
Tyler, Texas 75710-0359
Telephone: (903) 597-8311
Fax: (903) 593-0846

**Attorneys for ALCATEL-LUCENT USA,
INC., and AT&T MOBILITY, LLC**

By: /s/ Mark W. McGrory
Mark W. McGrory (pro hac vice)
Lawrence A. Rouse (pro hac vice)
ROUSE HENDRICKS GERMAN
MAY PC
1201 Walnut, 20th Floor
Kansas City, MO 64106
Tel: (816) 471-7700
Fax: (816) 471-2221
MarkM@rhgm.com
LarryR@rhgm.com

Michael E. Jones
State Bar No. 10929400
Allen F. Gardner
State Bar No. 24043679
POTTER MINTON, P.C.
110 N. College, Suite 500
Tyler, Texas 75702
Tel: (903) 597-8311
Fax: (903) 593-0846
mikejones@potterminton.com
allengardner@potterminton.com

Attorneys for SPRINT SPECTRUM L.P.

2001 Ross Avenue
Dallas, Texas 75201
Telephone: (214) 953-6500
Facsimile: (214) 953-6503

**ATTORNEYS FOR AT&T MOBILITY
LLC, ERICSSON INC.,
TELEFONAKTIEBOLAGET LM
ERICSSON AND METROPCS
COMMUNICATIONS, INC.**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically on August 8, 2014, in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service per Local Rule CV-5(b)(1).

/s/ Marc Kaplan

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and
AT&T MOBILITY LLC,

Defendants.

Civil Action 6:12-cv-0022

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and
CELLCO PARTNERSHIP
d/b/a VERIZON WIRELESS,

Defendants.

Civil Action 6:12-cv-0122

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and
SPRINT SPECTRUM L.P.,

Defendants.

Civil Action 6:12-cv-0123

ADAPTIX, INC.,

Plaintiff,

v.

T-MOBILE USA, INC.,

Defendant.

Civil Action 6:12-cv-369

ADAPTIX, INC.,

Plaintiff,

v.

AT&T MOBILITY LLC, ERICSSON INC.,
METROPCS COMMUNICATIONS, INC.,
and TELEFONAKTIEBOLAGET LM
ERICSSON,

Defendants.

Civil Action 6:13-cv-049

ADAPTIX, INC.,

Plaintiff,

v.

AT&T MOBILITY LLC, ERICSSON INC.,
METROPCS COMMUNICATIONS, INC.,
and TELEFONAKTIEBOLAGET LM
ERICSSON,

Defendants.

Civil Action 6:12-cv-050

**[PROPOSED] ORDER GRANTING STIPULATION AND AGREED MOTION
TO MODIFY EXPERT DISCOVERY DEADLINES**

Before this Court is the parties' Stipulation and Agreed Motion To Modify Expert Discovery Deadlines. The Court having considered the Motion,

IT IS HEREBY ORDERED THAT the Court GRANTS the parties' Stipulation and Agreed Motion To Modify Expert Discovery Deadlines, and the expert discovery deadlines will be modified as agreed to and set forth below.

Pretrial Event	Deadline
Deadline to designate expert witnesses and reports on issues for which the party does not bear the burden of proof (¶ 5)	September 3, 2014
Expert discovery deadline	September 17, 2014